

EXHIBIT L

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK

4 -----X
5 KASHIF ALLEYNE AND DAMANI MCFARLANE,
6 Plaintiffs,

15CV1860

7 -against-

(WFK) (VMS)

8 P.O. WALIUR RAHMAN, SHIELD NO. 6428; DET.
9 YIKA MORALES, SHIELD NO. 5430; DET. NATIA
KALANDADZE, SHIELD NO. 20858; DET. JAMES
10 MCCULLOUGH, SHIELD NO. 31112; DET. LORNE
KANOVER, SHIELD NO. 1824,
11 Defendants.

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12
13 305 Broadway
New York, New York

14
15 June 21, 2016
16 10:51 a.m.
17

18 EXAMINATION BEFORE TRIAL of DET.
19 NATIA KALANDAZE, in the above-entitled
20 action, held at the above time and place,
21 taken before Denise Rizek a Notary Public
22 of the State of New York, pursuant to the
23 Federal Rules of Civil Procedure, Notice
24 and stipulations between counsel.
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A P P E A R A N C E S:

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STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED, by
and among counsel for the respective
parties hereto, that the filing, sealing
and certification of the within
deposition shall be and the same are
hereby waived;

IT IS FURTHER STIPULATED AND AGREED,
that all objections, except as to form of
the question, shall be reserved to the
time of trial;

IT IS FURTHER STIPULATED AND AGREED,
that the within deposition may be signed
before any Notary Public with the same
force and effect as if signed and sworn
to before the Court.

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2 D E T. N A T I A K A L A N D A D Z E,
3 having first been duly sworn by a Notary
4 Public of the State of New York, was
5 examined and testified as follows:

6 EXAMINATION BY

7 MR. MARINELLI:

8 Q. Please state your name for the
9 record.

10 A. Detective Natia Kalandadze.

11 Q. What is your address?

12 A. One Police Plaza, New York, New
13 York 10038.

14 Q. Have you ever testified at a
15 deposition before?

16 A. Yes, I have.

17 Q. Do you know how many times you
18 testified at a deposition?

19 A. I don't remember.

20 Q. Can you estimate?

21 A. A couple times probably.

22 Q. Did you know what it means to
23 testify at a deposition? Why you're
24 here?

25 A. To tell what happened.

1 DET. NATIA KALANDADZE

2 Q. But did you use the rabbit tool
3 to help open the door?

4 A. This specific location, no.

5 Q. Did you use the rabbit to open
6 the door anywhere?

7 A. No.

8 Q. You were the rabbit assistant,
9 right?

10 A. Yes, sir.

11 Q. So what did you do that day?

12 A. As I arrived at the location,
13 the assignment changed.

14 Q. Okay. So what was your
15 assignment?

16 A. Front security.

17 Q. Did you ever go in the
18 building?

19 A. No.

20 Q. Ever have any involvement with
21 the arrest of Kashif Alleyne or Damani
22 McFarlane?

23 A. There was a female arrested and
24 a male who jumped.

25 Q. Those are the only ones you

1 DET. NATIA KALANDADZE

2 saw?

3 A. Yeah.

4 Q. Can you step out for a second.

5 A. Sure.

6 MR. MARINELLI: This is the
7 person that was given that was
8 supposed to be involved with Damani
9 McFarlane arrest.

10 MS. RODRIGUEZ: No. This is
11 the person that you were given with
12 Morales as a guard and I think the
13 only involvement with the guard --

14 MR. MARINELLI: We're done.
15 We're done. You never said about
16 this. You never included her. You
17 never said that she didn't go in.

18 MS. RODRIGUEZ: I did mention
19 that to you. I asked you in your
20 email -- when I asked you the
21 guard --

22 MR. MARINELLI: Off the record.

23 (Whereupon, the proceedings
24 were concluded 10:58 a.m.)
25